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Attorneys for defendant  
Calvary Portfolio Services, LLC

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF CALIFORNIA

CORY HORTON, on behalf of  
himself and all others similarly  
situated.

Plaintiff,

VS.

## CAVALRY PORTFOLIO SERVICES, LLC,

Defendant.

KEVIN KREJCI,

Plaintiff,

VS.

## CAVALRY PORTFOLIO SERVICES, LLC,

Defendant.

) CASE NO. 13-CV-00307-JAH-WVG

**JOINT MOTION TO EXTEND TIME  
TO FILE A MOTION FOR  
PRELIMINARY APPROVAL**

Honorable John A. Houston

CASE NO. 3:16-CV-00211-JAH-WVG

**JOINT MOTION TO EXTEND TIME  
TO FILE A MOTION FOR  
PRELIMINARY APPROVAL**

## Honorable John A. Houston

1 Pursuant to the Court's Order (ECF Docket 283) to file a timely Motion for  
2 Preliminary Approval by January 31, 2020, plaintiff Cory Horton and plaintiff Kevin  
3 Krejci (hereinafter "Plaintiffs") and defendant Calvary Portfolio Services, LLC  
4 ("Defendant") respectfully request that the Court grant their Joint Motion to Extend  
5 the time for both parties to file a Motion for Preliminary Approval from the current  
6 deadline January 31, 2020 to February 21, 2020.

7 Good cause exists for the brief extension. Counsel for both parties have been  
8 in constant communication over the past weeks regarding the confirmatory discovery  
9 contemplated by the settlement, and interrogatory responses have been provided. In  
10 addition, a deposition of a Cavalry representative is now set for January 24, 2020.  
11 The parties have also been exchanging drafts and revisions of the Settlement  
12 Agreement and related exhibits. Despite their best efforts, the parties do not believe  
13 they will be in a position to file the Motion for Preliminary Approval on the current  
14 deadline. Accordingly, Plaintiffs and Defendant respectfully and jointly request an  
15 extension to file the Motion for Preliminary Approval to February 21, 2020.

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17 DATED: January 23, 2020

Respectfully Submitted,

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/s/ Tomio B. Narita

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By:

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Simmonds & Narita, LLP  
Attorneys for defendant  
Calvary Portfolio Services, LLC

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By: /s/ Adrienne D. McEnee

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Adrienne D. McEntee, Esq.  
Terrell Marshall Law Group  
Attorney for Plaintiff Cory Horton

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By: /s/ Sergei Lemberg

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Sergei Lemberg, Esq.

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Attorney for Plaintiff Kevin Krejci